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Inc., Robert Leshner, and Geoffrey Hayes*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Reorganized Debtors,

MOHSIN Y. MEGHJI, LITIGATION  
ADMINISTRATOR, AS REPRESENTATIVE FOR THE  
POST-EFFECTIVE DATE DEBTORS,

Plaintiff,

v.

COMPOUND LABS, INC., COMPOUND DAO,  
ROBERT LESHNER, and GEOFFREY HAYES,

Defendants.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

Adversary Proceeding

Adv. P. No. 24-03989 (MG)

Civil No. 25 Civ. \_\_\_\_\_

**NOTICE OF MOTION TO WITHDRAW THE REFERENCE  
PURSUANT TO 28 U.S.C. § 157(D) BY DEFENDANTS  
COMPOUND LABS, INC., ROBERT LESHNER, AND GEOFFREY HAYES**

<sup>1</sup> The Post-Effective Debtors in these chapter 11 cases (“**Chapter 11 Cases**”), along with the last four digits of each Post Effective Date Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450).

**PLEASE TAKE NOTICE** that Defendants Compound Labs, Inc., Robert Leshner, and Geoffrey Hayes (“**Moving Defendants**”), upon this notice of motion and the accompanying Memorandum of Law and Declaration of Jason P. Gottlieb, respectfully move (this “**Motion**”) the United States District Court for the Southern District of New York for entry of an order, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, withdrawing the reference to the Bankruptcy Court of the above-captioned adversary proceeding brought by Plaintiff Mohsin Y. Meghji (Litigation Administrator for Celsius Network LLC and its affiliated Debtors (“**Celsius**”)).

**PLEASE TAKE NOTICE** that, pursuant to Rule 6.1(b) of the Local Rules of the United States District Court for the Southern District of New York, Celsius’s deadline to file any opposing or response paper is February 10, 2025; and Moving Defendants’ deadline to file any reply papers is February 17, 2025.

**WHEREFORE**, Moving Defendants respectfully request that the District Court enter an order granting the relief requested herein, and such other and further relief as the District Court deems just and appropriate.

*[Remainder of page intentionally left blank.]*

Dated: New York, New York  
January 27, 2025

Respectfully submitted,

**MORRISON COHEN LLP**

By: /s/ Jason P. Gottlieb

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